

**Public Comment From Co-Chairs of the Census Quality Reinforcement Task Force,  
Submitted for the May 4-5 Meeting of the National Advisory Committee:**

**Submitted by email to [shana.j.banks@census.gov](mailto:shana.j.banks@census.gov)**

We are Dr. Allison Plyer, Chief Demographer of The Data Center of Southeast Louisiana, and Cara Brumfield, Director of Income and Work Supports at The Center for Law and Social Policy.. We are commenting as co-chairs of the Census Quality Reinforcement Task Force, a multidisciplinary learning community bringing together lived experience and academic, statistical, legal, demographic and civil rights expertise, who focus on supporting accuracy and fairness in public data, starting with the decennial census.

We note with approval that GAO has removed the decennial census program from their list of at-risk government programs, and we hope that action marks the end of a harmful over-emphasis on “per household cost” as the main lens through which GAO and Congress view the census, crowding out more important concerns: accuracy and equity.

The differential undercounts of people of color are well-documented and measured flaws in our public data, leading communities of color to receive less than their share of representation and resources. This has an immeasurable impact on our ability to enforce civil rights protections, ensure the health of our democracy, and meet the needs of communities.

We also strongly support addressing the undercount of very young children, as well as renters and people who live in rural areas. In our professional judgment, it will be hard if not impossible to make progress in those areas without addressing the racial and ethnic undercounts.

We commend Director Santos and Associate Director Velkoff’s plan for improving the Population Estimates building on the work of the Base Evaluation and Research Team. The Commerce Department and White House Office of Management and Budget also deserve commendation for adopting the plan, and should allow no delay or fiscal impediment. Population Estimates improvement can and should mitigate the undercounts, rightsizing the flow of \$1.5 Trillion in federal funding each year. Building a high degree of accuracy in the Population Estimates will also set a strong benchmark for the 2030 Census.

We also commend Director Santos and the Census Bureau for standing up a Cross-Directorate Working Group on the Racial and Ethnic Undercounts. It is a central problem, as old as the republic, and will require your collective energies.

We continue to believe that administrative records, which can be so beneficial in augmenting and updating the Population Estimates, will not supply all the details the Census Bureau needs about how Americans self-identify, and should not be relied on as the primary solution to the endemic differential undercounts.

We want to conclude by thanking the members of the NAC and the staff of the Census Bureau for your work, and for considering these recommendations.

– Dr. Allison Plyer, Chief Demographer, The Data Center, and Cara Brumfield, Director, Director of Income and Work Supports at The Center for Law and Social Policy.